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*FIRM and AFFILIATE OFFICES*

MICHAEL TILIAKOS  
DIRECT DIAL: +1 212 692 1045  
PERSONAL FAX: +1 212 202 6231  
E-MAIL: [mtiliakos@duanemorris.com](mailto:mtiliakos@duanemorris.com)

[www.duanemorris.com](http://www.duanemorris.com)

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January 23, 2015

## VIA ECF

Honorable Paul A. Crotty  
United States District Court  
Southern District of New York  
Room 1350  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: **Giovanni Morelos v. 1382 Diner, Inc. d/b/a Trend Diner & Restaurant et al.,  
14-CV-9002 (PAC)**

Dear Judge Crotty:

We represent Defendants in the above-captioned FLSA action. We write to request a thirty (30) day extension of time to respond to the allegations contained in Plaintiff's complaint. Defendant's response is currently due January 26, 2015. This is the first such request for an extension. Plaintiff's counsel has consented to this request.

The parties have been engaged in settlement discussions – including production of documents - in an attempt to resolve this matter. While the parties have made great strides in these efforts, additional time is needed so that the parties may focus their time and resources on

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such discussions. Accordingly, Defendants respectfully request that their time to respond to the complaint be extended from January 26, 2015 to February 23, 2015.

Thank your for consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Tiliakos", with a stylized flourish at the end.

Michael Tiliakos

cc: Benjamin Dictor, Esq. (via ECF and email (Ben@EisnerAssociates.com))